

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHEVRON CORPORATION, :
: v.
Plaintiff, :
: 11 Civ. 0691 (LAK)
: STEVEN DONZIGER, *et al.*, :
: Defendants. :
: ----- x

**NOTICE OF CHEVRON CORPORATION'S
MOTION TO HOLD STEVEN DONZIGER IN CONTEMPT OF
PARAGRAPHS 1 AND 5 OF THE RICO JUDGMENT
BASED ON HIS TRANSACTIONS WITH DAVID ZELMAN**

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PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Chevron Corporation’s (“Chevron”) Motion to Hold Steven Donziger in Contempt of Paragraphs 1 and 5 of the RICO Judgment Based on His Transactions with David Zelman; the Declaration of Anne Champion, dated March 20, 2019; and all prior pleadings and proceedings in this matter, Chevron respectfully moves this Court for entry of an order holding Steven Donziger in civil contempt pursuant to Federal Rule of Civil Procedure 70(e) and Local Civil Rule 83.6 of the Local Rules of the United States District Court for the Southern District of New York.

More specifically, to bring Donziger into compliance with the RICO Judgment (Dkt. 1875), Chevron seeks an order: (i) requiring Donziger to pay Chevron \$14,000, representing the value of the services Donziger obtained by transferring a portion of his interest in the Ecuadorian Judgment to David Zelman; (ii) ruling that the transfer of Donziger’s interest in the Ecuadorian judgment to David Zelman is invalid and void, requiring Donziger to take steps to rescind the transfer, and further requiring Donziger to produce an affidavit complying with the requirements outlined in 28 U.S.C. § 1746, without any amendments thereto, verifying that he has taken those steps; (iii) requiring Donziger to provide quarterly reports to Chevron and the Court identifying any other new or amended agreements he has entered or facilitated that allow him to profit from or monetize the Ecuadorian judgment and any offers, discussions or negotiations to do so, even if they did not or do not materialize in a final agreement, and requiring Donziger to submit a sworn affidavit complying with the requirements outlined in 28 U.S.C. § 1746, without any amendments thereto, verifying the accuracy of the quarterly reports; (iv) imposing coercive sanctions if Donziger fails to comply with these requirements; and (v) awarding Chevron its reasonable attorneys’ fees and costs incurred in litigating this motion and uncovering the evidence of contempt.

Dated: March 20, 2019
New York, New York

Respectfully submitted,
GIBSON, DUNN & CRUTCHER LLP
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